



RONALD D. COLEMAN
RCOLEMAN@DHILLONLAW.COM

August 16, 2022

BY ECF

Hon. John G. Koeltl, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *Business Casual Holdings, LLC v. YouTube, LLC*
1:21-cv-03610-JGK

Dear Judge Koeltl:

We represent plaintiff in the above-captioned matter. I write to request an extension, *nunc pro tunc*, of seven days for the submission of Plaintiff's reply brief in support of its motion to amend the complaint.

The reason for this request, as well as its belated timing, is the deteriorating health of my client.

Mr. Edson, Plaintiff's principal, suffers from severe bilateral tinnitus, a condition that causes extremely loud and constant ringing in the ears. He is in agonizing pain and cannot function at this time. I expected to receive my client's feedback and approval on the reply submission at the end of last week, but he simply has been unable to operate.

We requested Defendants' consent to this request. They responded: "While we have consented to numerous requests for extensions in the past, given that you did not request any extension of the reply deadline until well after that deadline had already passed last Friday, Defendants cannot consent to a retroactive extension."

Mr. Edson is doing his best, which he understands is not enough at times. He asks for this Court's understanding. The outcome of this case will have a direct impact on millions of creators on YouTube's platform. For this reason, it is important the Court hear our response to Defendant's opposition so that it can make the right decision in this matter.

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No request for this relief has been submitted before.

We appreciate the Court's consideration of this request in advance.

Respectfully submitted,



Ronald D. Coleman